

1 GEOFFREY A. HANSEN,
2 Acting Federal Public Defender
3 MANUEL U. ARAUJO
4 Assistant Federal Public Defender
160 West Santa Clara Street, Suite 575
San Jose, CA 95113
Telephone: (408) 291-7753

5 | Counsel for Defendant RUIZ-LOPEZ

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7 || IN THE UNITED STATES DISTRICT COURT

8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 SAN JOSE DIVISION

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STIPULATION

19 Defendant and the government, through their respective counsel, subject to the court's
20 approval, hereby stipulate that the Court continue the status hearing in the above-captioned
21 matter, presently scheduled for, May 2, 2012 at 9:00 a.m., to May 30, 2012, at 9:00 a.m. The
22 reason for the stipulation is as follows. Defense counsel was recently reassigned this case from
23 Assistant Federal Public Defender Heather Rogers who resigned from the office effective April
24 13, 2012. The undersigned defense counsel for Mr. Ruiz-Lopez needs additional time to review
25 the file, confer with his client, and complete any investigation suggested by his discussions with
26 his client. Counsel also needs time to discuss with the assistance an interpreter the plea offer

**Stipulation to Continue Status Hearing;
[Proposed] Order**

1 extended by the government. In addition, defense counsel is a member of the Federal Public
2 Defender's Office hiring committee which will be conducting all-day interviews on May 2,
3 2012. The parties further agree and stipulate that time should be excluded from and including
4 May 2, 2012, through and including May 30, 2012, to provide counsel reasonable time to
5 prepare, pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and (B)(iv). Accordingly,
6 the United States and the defendant agree that granting the requested exclusion of time will serve
7 the interest of justice and outweigh the interest of the public and defendant in a speedy trial.

8 Dated: April 25, 2012

9 _____/s/
10 MANUEL ARAUJO
Assistant Federal Public Defender

11 Dated: April 25, 2012

12 _____/s/
13 CAROLYNE A. SANIN
Special Assistant United States Attorney

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15 **[PROPOSED] ORDER**

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17 Good cause appearing and by stipulation of the parties, it is hereby ordered that the status
18 conference hearing in the above-captioned matter is continued from May 2, 2012, at 9:00 a.m., to
19 May 30, 2012, at 9:00 a.m. It is further ordered that the period of delay from May 2, 2012,
20 through and including May 30, 2012, be excluded for purposes of Speedy Trial Act
21 computations pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and
22 3161(h)(7)(B)(iv).

23 Dated: 4/26/12

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25 HONORABLE LUCY H. KOH
United States District Judge